

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION VII

999 18th STREET - SUITE 500

SEP 24 1991 DENVER, COLORADO 80202-2405

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Ref: SHWM-FF

Mr. David Simonson  
Department of Energy  
Rocky Flats Office  
P.O. Box 928  
Golden, Colorado 80402-0928

RE: Administrative Record

Dear Mr. Simonson:

EPA has reviewed your July 17, 1991 submittal of the Administrative Record File Index for Site-Wide (SW) and Operable Unit No. 1 (OU1) files and the Summary of Administrative Record Procedures screening criteria outline. We are providing you with comments regarding these submittals to assure compliance with CERCLA, RCRA and IAG requirements.

The contents of the Administrative Record must include all CERCLA response action documents that are circulated to EPA and CDH, including but not limited to Remedial Investigations, Feasibility Studies and Decision Documents as well as other pertinent CERCLA/RCRA response action documents as directed by EPA and CDH. Therefore, draft copies of documents submitted to the regulatory agencies for review and the regulatory agencies' comments are required entries in the Administrative Record. Documents pertaining to sitewide activities, such as Standard Operating Procedures, and correspondence relating to the above documents must also be included in the Administrative Record supporting all decision documents.

The Administrative Record must have a section for citizen comments, public notices and other community information pertinent to CERCLA/RCRA response actions.

In terms of the Administrative Record structure, EPA recommends developing an index of documents supporting each individual decision document or record of decision/corrective action decision (ROD/CAD). An additional index supporting all decision documents should also be considered as there is overlap between the operable units. All indices must identify the location of each document.

As required by 40 CFR Section 300.615, the Administrative Record must be established during the investigation phase, and completed prior to EPA approving an interim remedial action/interim measure (IRA/IM) decision document or ROD/CAD. Once a decision document is signed, the Administrative Record for

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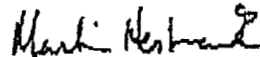
that action cannot be reopened but can be supplemented only in accordance with 40 CFR Section 300.825. Thus, prior to signing the IM/IRA decision document for Operable Unit 4, the Administrative Record must be completed and approved by EPA and CDH.

The Administrative Records for Operable Unit 1 and Operable Unit 2 IM/IRAs and for the ongoing CERCLA/RCRA activities at the Rocky Flats Plant must be revised to meet the requirements stated in this letter. The revisions must be submitted to EPA by November 1, 1991.

The IAG requires DOE to submit quarterly updates of the Administrative Record to EPA and CDH. Please begin the quarterly submittals with the submittals of the revised Administrative Records for OUs 1 and 2.

If you or members of your staff have questions pertaining to the contents of this letter, please contact me at 294-1134.

Sincerely,



Martin Hestmark, Manager  
Rocky Flats Project

cc: Peter Ornstein, EPA  
Gary Baughman, CDH  
Barbara Barry, CDH  
Rich Schassburger, DOE  
Arturo Duran, EPA